

Robert A. Julian (SBN 88469)
Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
1160 Battery Street, Suite 100
San Francisco, CA 94111
Telephone: 628.208.6434
Facsimile: 310.820.8859
Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Blvd., Suite 1400
Los Angeles, CA 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: lattard@bakerlaw.com

Counsel to the Official Committee of Tort Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**STATEMENT OF NON-OPPOSITION
TO DEBTORS' MUTUAL ASSISTANCE
MOTION (Dkt. No. 2588)**

Hearing Date: July 9, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102
Judge: Hon. Dennis Montali

1 On June 18, 2019, PG&E Corp. and Pacific Gas and Electric Company (collectively, the
2 “Debtors” or “PG&E”) filed an Omnibus Motion Pursuant to 11 U.S.C. § 365(a), Fed. R. Bankr.
3 P. 6006, and B.L.R. 6006-1 to Approve the Utility’s Assumption of Mutual Assistance Agreements
4 (the “**Mutual Assistance Motion**”) (Dkt. No. 2588), which seeks authority to assume six
5 agreements (the “**Mutual Assistance Agreements**”) that each provide a framework for the Debtors
6 and other utilities or government agencies to voluntarily provide assistance to each other in
7 emergency or disruptive situations.

8 The Official Committee of Tort Claimants (the “TCC”) does not oppose the Mutual
9 Assistance Motion, given the representations therein that assumption of the Mutual Assistance
10 Agreements is necessary to avoid “difficulty in obtaining the critical and necessary assistance of
11 other utilities during future outages and emergency situations” and that “the number of Assisting
12 Parties which have responded to requests for mutual assistance following the commencement of
13 the Chapter 11 Cases has been lower than the Utility would expect based on previous requests[.]”
14 (Mutual Assistance Motion at pp. 11-12). Given the extreme importance of rapid response to fires,
15 the Debtors should seek assurances from their counterparts that they will assist when requested.
16 This is particularly true of the counterparts receiving cure payments, which exceed \$28 million, but
17 such amounts could pale in comparison to the costs of uncontained future wildfire liability.

18
19 Dated: July 2, 2019

20
21 BAKER & HOSTETLER LLP

22 By: /s/ Lauren Attard

23 *Counsel to the Official Committee of Tort*
24 *Claimants*